

UNITED STATES OF AMERICA

v.

DAVID CRESPO

Criminal Action No. 1:13-cr-00428-RBK

EMERGENCY SUPPLEMENT TO PENDING MOTION FOR COMPASSIONATE RELEASE

AND

EMERGENCY MOTION FOR APPOINTMENT OF COUNSEL

APR 28 2022  
RECEIVED

Now Comes, defendant in the above titled action to respectfully notify this Court of new developments that are germane to defendant's pending motion for sentence reduction.

(1) On or about November 29, 2021 defendant filed his initial Motion For Compassionate. Approx. one month later, defendant supplemented said motion to include relevant information that would be helpful to this Court when considering said motion.

(2.) On or about February 1, 2022, the government responded in opposition to said motion. And, in the body of the government's oppositional motion, the government represented to this Court that, a Dr. Diane Sommer at USP Canaan, informed the government that defendant's, "Occipital lipoma (fatty mass) that is a benign lesion on his neck." Dr. Sommer's also represented to the government that "she could manipulated the fatty mass persuading her that it was benign"

(3.) As this Court is aware, defendant argued vigorously against the aforementioned assertions put forth by the government, on behalf of Dr. Sommer, and defendant again, requested appointment of counsel, so he could have professional assistance with obtaining the relevant documentation that is being hidden from this Court in the government's effort to misrepresent and/or downplay defendant's serious condition(s) as it relates to his current medical state.

\* NEW DEVELOPMENTS \*

(4.) On or about March 24, 2022 a new "CT scan" was performed on defendant's "Lipomatous lesion in the right occipital region. Small lymph node under the chin". (i.e. fatty tumor)

(5.) On or about April 11, 2022 the outside Doctor/General Surgeon from the hospital near the prison institution, opined that defendant's fatty tumor is more than likely cancerous, and that defendant needs to have a surgery procedure conducted soon to remove the same, to prevent further spreading.

\* (6.) Appalling, is the fact that defendant has been arguing to this Court, USP-Canaan's medical staff, and to the U.S. government, that said lump was cancer, and painful. Allwhile, the government's attorney and Dr. Diane Sommers vigorously represented/misrepresented to this Court, that defendant's "alleged physical troubles are either grossly exaggerated or at the least overstated"

To be sure, the government and Dr. Sommer's is playing an extremely dangerous and unethical game with this defendant's health and/or LIFE.

They berated, and discounted, defendant's allegations related to his health simply to have this Court deny

and/or disregard defendant's seriously dangerous medical condition.  
(7.) To compound said unscrupulous chain of events, on or about April 20, 2022 defendant was in USP-Camden Medical Department, and a Dr. Narceonis provided defendant with documentation from the aforementioned General Surgeon, which accurately described defendant's "fatty mass" as potentially cancerous and also stressed the urgent need for surgery. But, when defendant stated that he would be sending said document to this Court, Dr. Narceonis snatched said document back from defendant's hand, and refused to return the same.

It is deplorable on its face that an institution, after obviously consulting with the government's attorney handling this case (V. Grady O'Malley) that they would have an interest and permission to conceal the true nature of defendant's health from this Court.

They are essentially playing judge, by limiting the relevant information that this Court receives. Said facts also underscores the very urgent need for the appointment of counsel in this matter.

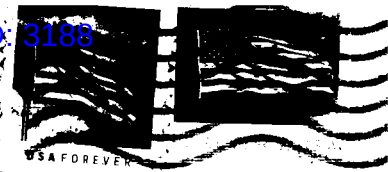
Appointed counsel can obtain defendant's medical records in its entirety, and present the same to this Court for appropriate consideration, notwithstanding the government's attempt to dangerously conceal the true nature of defendant's medical condition.

Respectfully Submitted,  
David Crespo  
4/23/22

United States Penitentiary  
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Waymart, PA 18472

LEHIGH VALLEY PA 180

25 APR 2022 PM 4 L



United States District Court  
c/o Office of the Clerk  
4th & Cooper Streets  
Camden, New Jersey

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AT 8:00

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Legal Mail

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